

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

VANCE WALLS

: NO.: CR-2-09-054(1)  
JUDGE FROST

MOTION AUTHORIZING  
DISCLOSURE OF GRAND JURY INFORMATION  
AND FOR AN ORDER LIMITING DISCLOSURE

In preparation for the sentencing hearing scheduled for July 1, 2010, the government has several grand jury transcripts and/or memoranda of interview for witnesses, whom we intend to call to testify at the sentencing hearing. The government intends to provide those to David Winters, counsel for defendant Vance Walls, at noon on June 30, 2010, the day prior to the sentencing hearing.

Each of these witnesses have provided this information as part of a criminal investigation in connection with the grand jury process. Many have provided information not only related to this case, but other investigations as well. All share a concern for their personal safety once they are identified as cooperating witnesses. The government has an obligation to protect their identities and exposure to the public as much as possible.

While the government does not oppose disclosure of the information contained in these witnesses statements to the defendant, the government also requests that copies of these statements not be made and provided to the defendant. These witnesses come from a relatively small community. The government

wants to avoid copies of their statements being circulated through the community. Similarly, should the defendant be incarcerated, the government wants to limit the possibility that these statements would be circulated to other inmates in prison.

The United States, therefore, requests this Court enter an Order authorizing the United States to disclose, prior to the sentencing hearing, grand jury testimony and/or memoranda of interview for said witnesses to defense counsel for Vance Walls. The government requests that the this Order limit such disclosure to defense counsel and the defendant. The government further requests that defense counsel and the defendant be prohibited from disclosing any of this information to third parties, except to the extent necessary to interview and prep witnesses for the sentencing hearing.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion for a protective order was served this 18th day of June, 2010, electronically on: David Winters, counsel for Vance Walls.

s/Robyn Jones Hahnert  
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ROBYN JONES HAHNERT (0022733)  
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